

The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD
SECRETARY

JOHN AUERBACH
COMMISSIONER

Brendan Cox
Suffolk County District Attorney's Office

September 19, 2011

Re: Comm. v. [REDACTED]

ADA Cox,
Please find the discovery materials for the case noted above collated in the following manner:

- 1) c.v.s of the chemists
- 2) the Drug Lab Evidence Office Receipt to the Boston Police
- 3) the inventory control card
- 4) the Drug Powder Analysis Form
- 5) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, the weighing and the preliminary tests of this exhibit. Annie Khan operated the gc/ms for the confirmatory testing. If you need further clarification of these materials, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".
Michael Lawler
Senior Chemist

Cc: Annie Khan

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits. Lab Safety Officer.

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court
Current Drug Trends – Multijurisdictional Drug Task Force Academy

CDC course in antibiotic resistance CDC course in cell culture

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Annie Khan (Dookhan)

Education:

University of Massachusetts, Boston, Ma, Master of Science in Chemistry.
University of Massachusetts, Boston, Ma, Bachelor of Science in Biochemistry.

Experience:

2003 – present

Chemist I, II, Massachusetts Department of Public Health, Drug Analysis Laboratory

- *Completed six-week training course conducted by senior staff within the Department of Public Health, Drug Analysis Laboratory.
- *Appointed Assistant Analyst by Assistant Commissioner of Public Health, 2004.
- *Responsible for the identification of illicit drugs to determine violations of harmful and narcotic drug laws.
- *Trained in the use of complex analytical instrumentation, microscopes and balances for the purpose of drug analysis.
- *Maintenance and repairs of all analytical instruments.
- *Responsible for the Quality Control of all analytical instruments, reagents and controls/standards.
- * Responsible for the Quality Control/Quality Assurance program for the drug lab.
- *Notary Public.
- *Qualified as an expert witness in Massachusetts Courts and U.S. District Court

2001 – 2003

QC Analyst I, II, UMMS-Massachusetts Biologic Laboratory, QC Material Control

- *Completed proficiency training conducted by a member of the staff within the MLB Quality Control and Quality Assurance Department.
- *Method Development for creating new techniques and enhancing vaccines for the QC Dept. and FDA.
- *Writing, revising and reviewing Standard Operating Procedures (SOPs).
- *Trained and supervised new chemists and interns for the department.
- *Routine QC testing of products for the FDA.
- *Trained in the use of complex analytical instrumentation, and balances for the purpose of QC analysis for product and validation projects.
- *Calibration, preventive maintenance, QC and QA of analytical instrumentation.
- *Complete testing of chemicals for Vendor Validation Project for the FDA.
- *Compendial testing and interpretation of the USP, ACS, FCC, AOAC, Merck Index, PDR, etc.

Additional Training:

Dept. of Justice – Forensics Professionals. (numerous trainings)
GLP/GMP course with Massachusetts Biologic Laboratory.
QC/QA training according to FDA Codes and Regulations.
GC and GC/MS courses with Agilent Technologies and Restek.
HPLC course with Waters Cooperation.
FTIR course with Spectros.
TOC training with MBL and Sievers.

Association:

American Chemical Society (ACS)
Northeastern Association of Forensics Science (NEAFS)



DRUG RECEIPT

CC # _____

BOOK #

PAGE #

DESTRUCTION #

District/Unit

✓h05

Name & Rank of Arresting Officer

Giffen

ID# 77822

DEFENDANT'S NAME	ADDRESS	CITY	STATE
[REDACTED]		Dorchester	MA

DESCRIPTION OF ITEMS SUBMITTED	GROSS QUANTITY	GROSS WEIGHT	LAB USE ONLY ANALYSIS NUMBER
C/S B, Crack Cocaine	10 P/B's	6.28g	

To be completed by ECU personnel only

Name and Rank of Submitting Officer

Received by

Date _____

11-19-70

ECU Control #

No. [REDACTED]

Date Analyzed: 02-09-11

City: Boston D.C.U. Police Dept.

Officer: P.O. Diana Lopez

Def: [REDACTED]

Amount:

Subst: SUB

No. Cont: 10 Cont: pb

Date Rec'd: 11/19/2010

No. Analyzed: 1

Gross Wt.: 6.28

Net Weight: 0.11

Tests: 9 PWL

• 2450

Prelim:

Cocaine (B)

Findings:

cocaine

GCMR
60208115

DRUG POWDER ANALYSIS FORM

29-11

SAMPLE # [REDACTED]

AGENCY [REDACTED]

ANALYST [REDACTED]

No. of samples tested: 1

Evidence Wt.

6.28

PHYSICAL DESCRIPTION:

10 pb with substance

Gross Wt (): 2.0482

Gross Wt (): _____

Pkg. Wt: _____

Net Wt: 0.1199

1 faste ✓

OHAW 2334 2-5-11

20g = 19.998

10g = 10.000g

5g = 5.000g

1g = 1.000g

PRELIMINARY TESTSSpot TestsCobalt (+)Thiocyanate (-)Marquis (-)Froehde's (-)Mecke's (-)Microcrystalline TestsGold (+)
Chloride (-)TLTA (+) (-)OTHER TESTS_____

_____PRELIMINARY TEST RESULTS

RESULTS _____

DATE _____

GC/MS CONFIRMATORY TEST

RESULTS COCAINE

MS
OPERATOR ASD

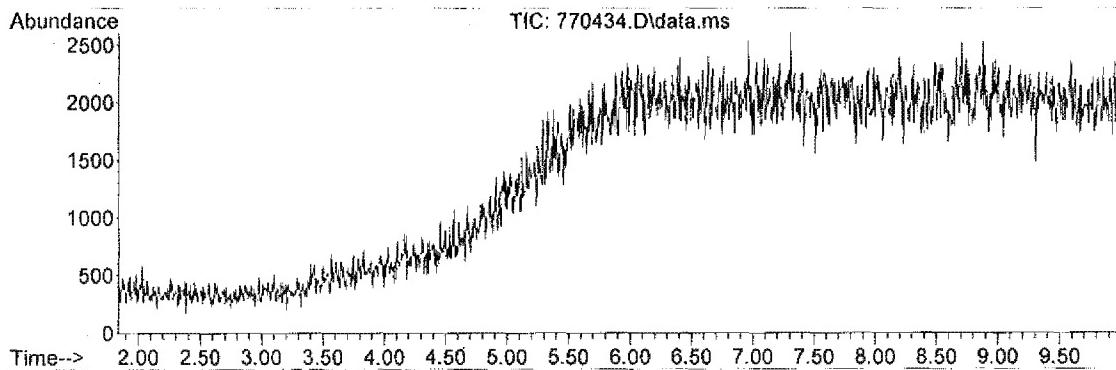
DATE 2-9-11

Area Percent / Library Search Report

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Operator : ASD
Date Acquired : 8 Feb 2011 15:16
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

✓
ASD
09-12-11



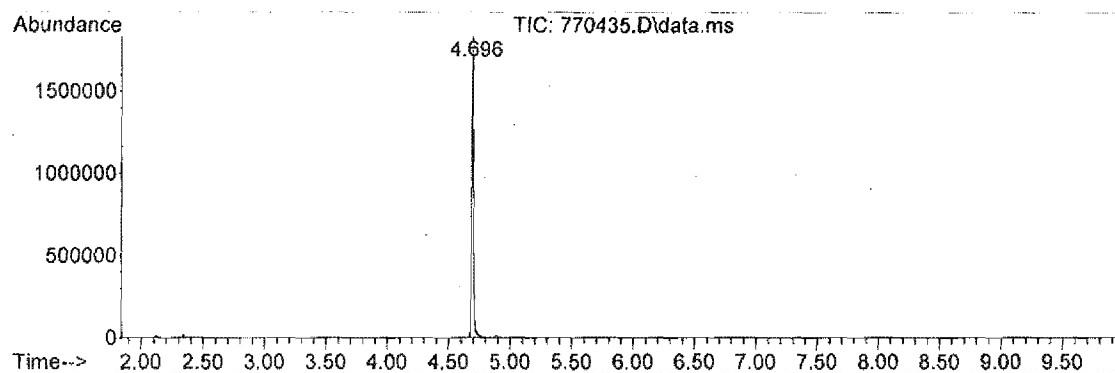
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

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Operator : ASD
Date Acquired : 8 Feb 2011 15:29
Sample Name : COCAINE STD
Submitted by :
Vial Number : 5
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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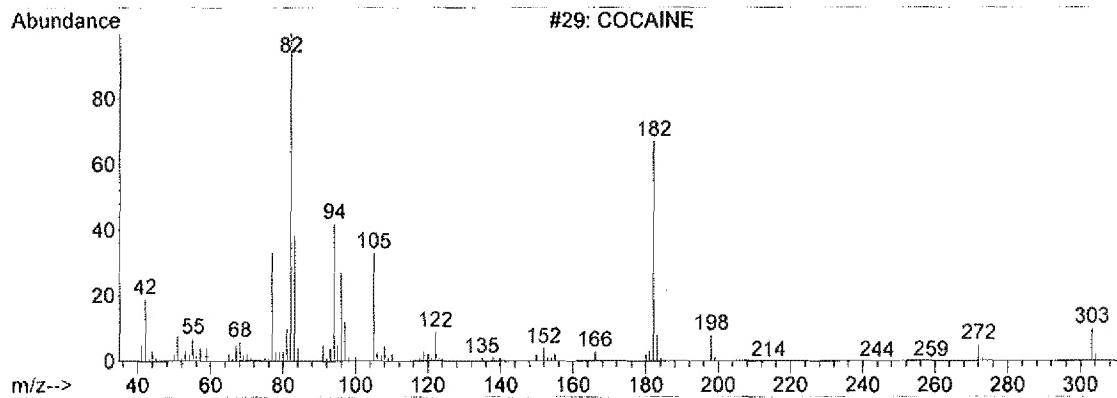
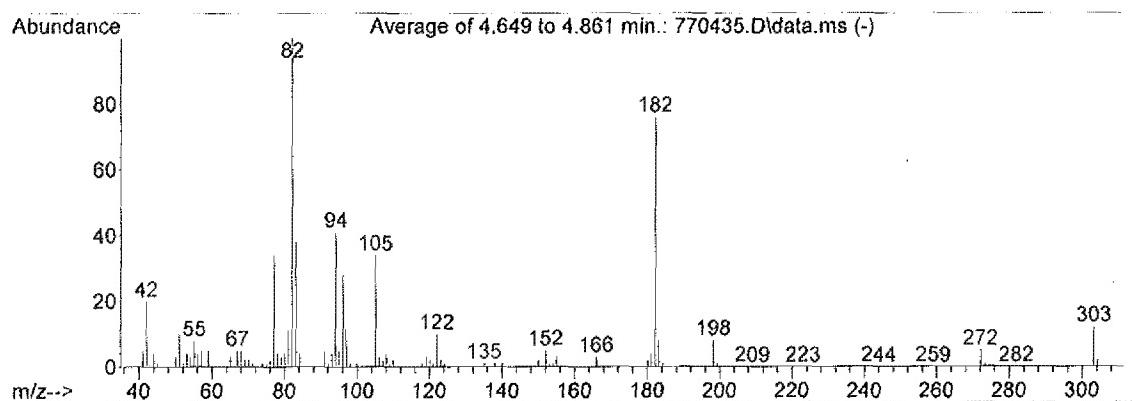
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Information from Data File:

File Name : C:\msdchem\1\System7\02_08_11\770435.D
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 Date Acquired : 8 Feb 2011 15:29
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 5
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

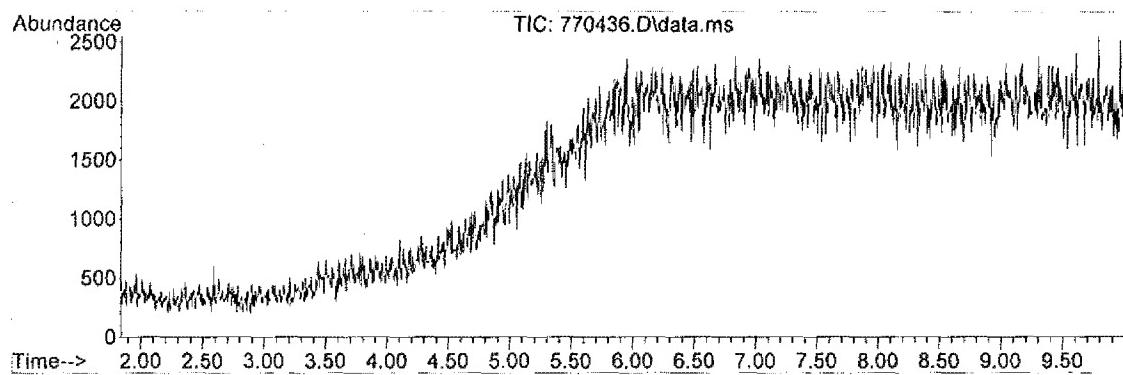
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Area Percent / Library Search Report

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Date Acquired : 8 Feb 2011 15:41
Sample Name : BLANK
Submitted by : DCS
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE



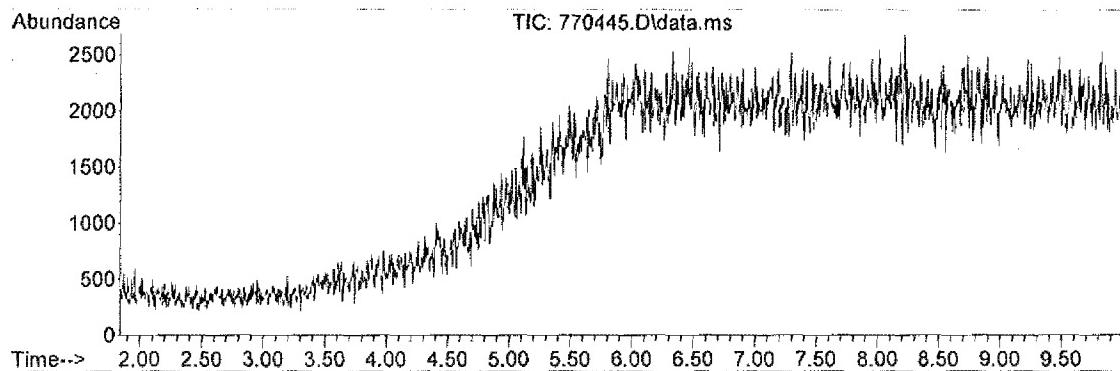
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

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Operator : ASD
Date Acquired : 8 Feb 2011 17:35
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE



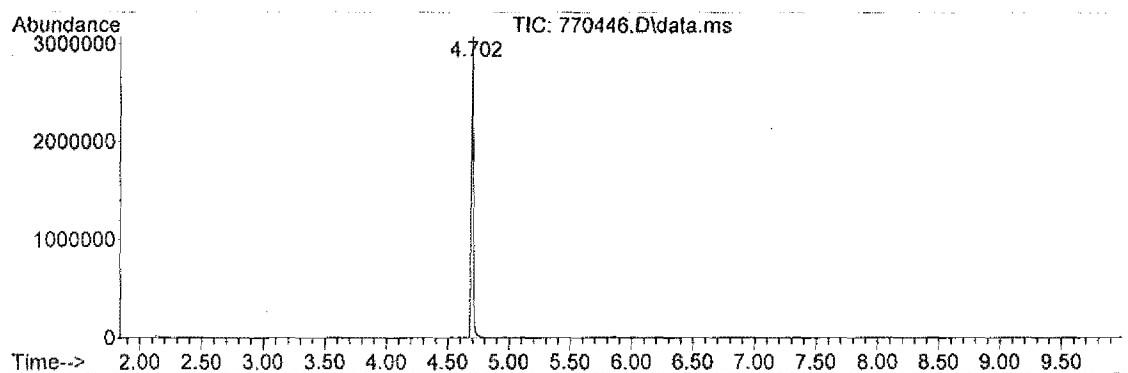
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

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Operator : ASD
Date Acquired : 8 Feb 2011 17:47
Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 46
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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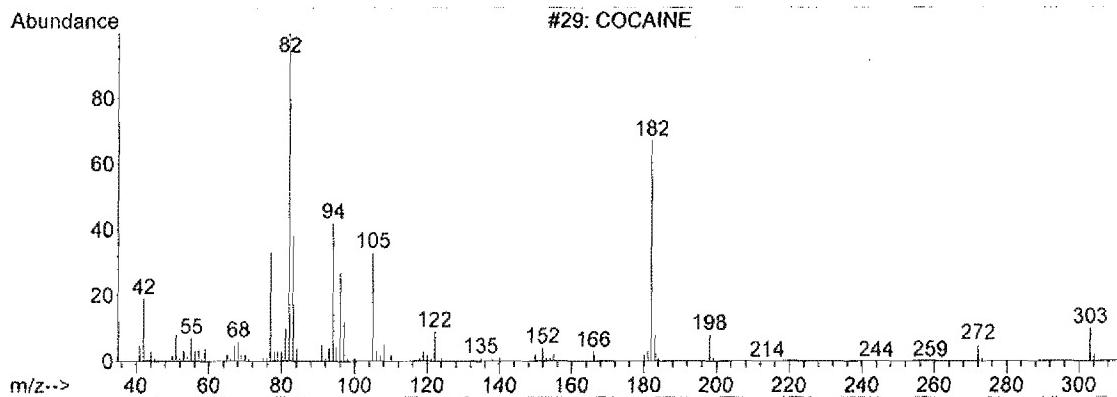
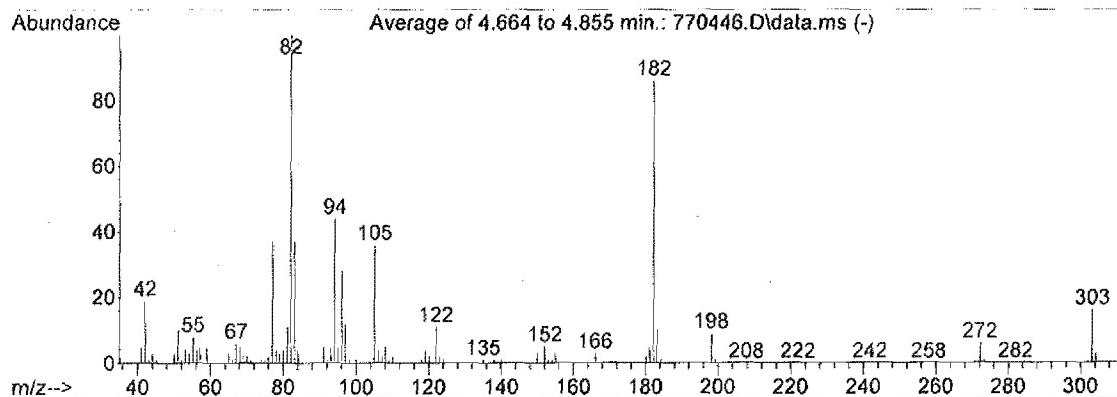
Area Percent / Library Search Report

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 Submitted by : MGL
 Vial Number : 46
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

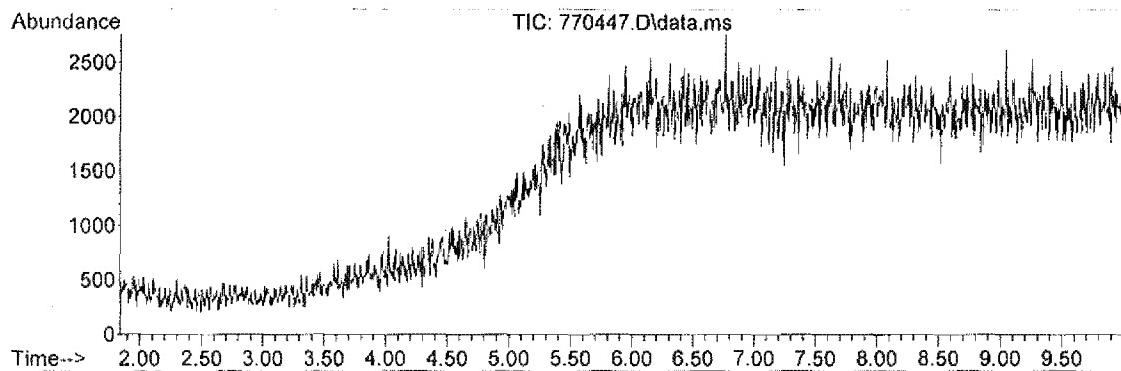
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Area Percent / Library Search Report

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Date Acquired : 8 Feb 2011 18:00
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE



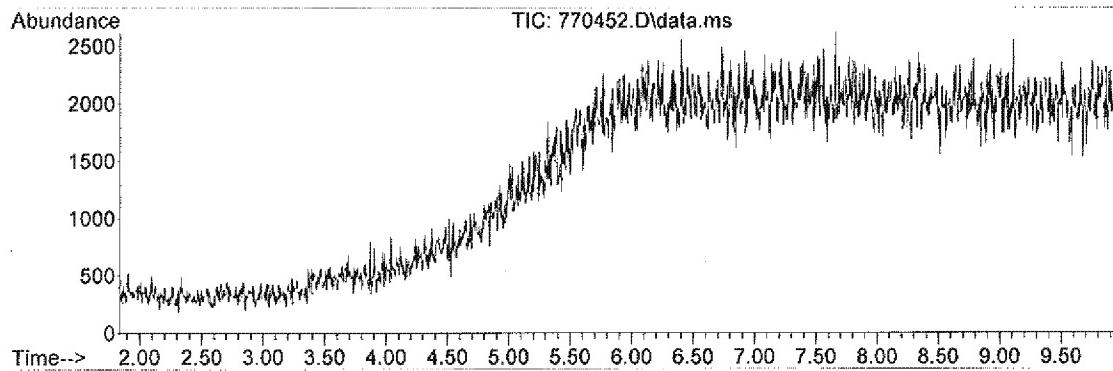
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

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Date Acquired : 8 Feb 2011 19:03
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: DRUGS.M
Integrator : RTE



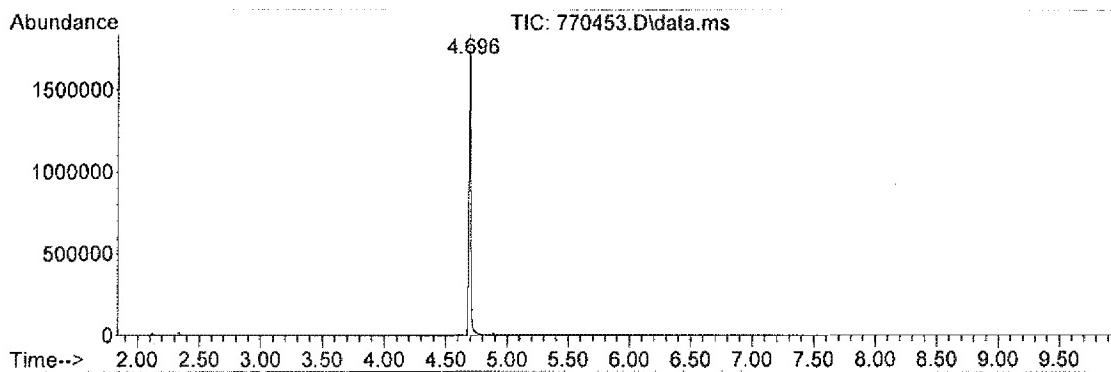
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\System7\02_08_11\770453.D
Operator : ASD
Date Acquired : 8 Feb 2011 19:16
Sample Name : COCAINE STD
Submitted by :
Vial Number : 5
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
4.696	1958240	100.00	100.00

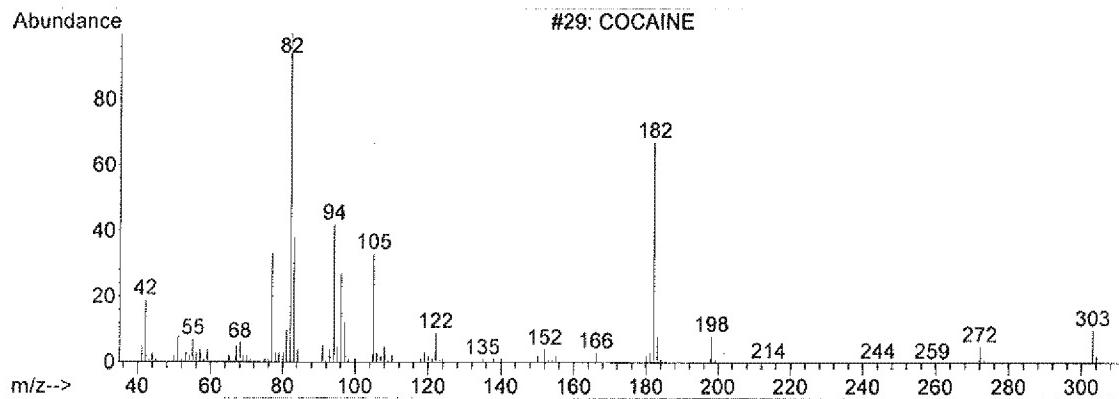
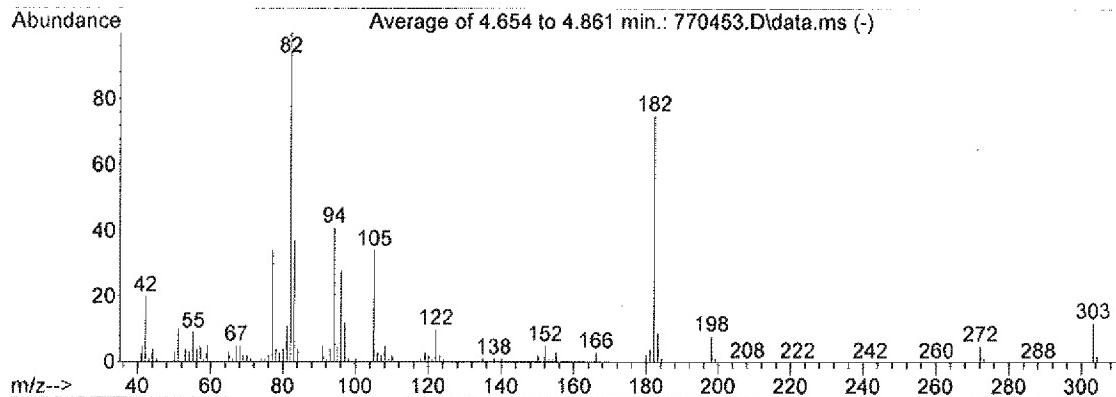
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Date Acquired : 8 Feb 2011 19:16
Sample Name : COCAINE STD
Submitted by :
Vial Number : 5
AcquisitionMeth: DRUGS.M
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

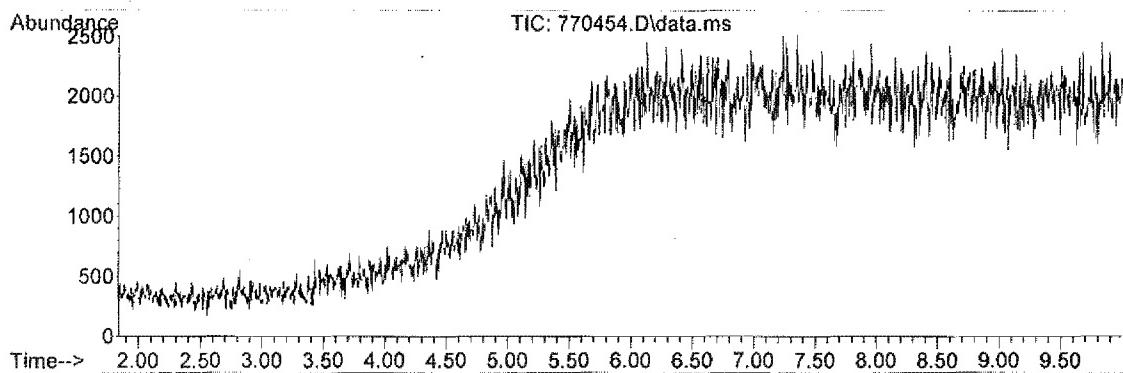
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Area Percent / Library Search Report

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Operator : ASD
Date Acquired : 8 Feb 2011 19:28
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

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transmission.
No further data.**